

1 W. PAUL SCHUCK (Cal. Bar No. 203717)  
2 pschuck@bztm.com  
3 BARTKO, ZANKEL, TARRANT & MILLER  
4 A Professional Corporation  
5 900 Front Street, Suite 300  
6 San Francisco, California 94111  
7 Telephone: (415) 956-1900  
8 Facsimile: (415) 956-1152

9 ANDREW G. DiNOVO (*Pro Hac Vice*)  
10 adinovo@dpelaw.com  
11 ADAM G. PRICE (*Pro Hac Vice*)  
12 aprice@dpelaw.com  
13 DiNOVO PRICE ELLWANGER & HARDY LLP  
14 7000 N. MoPac Expressway, Suite 350  
15 Austin, TX 78731  
16 Telephone: (512) 539-2626  
17 Facsimile: (512) 539-2627

18 Attorneys for Plaintiff  
19 DIGITAL REG OF TEXAS, LLC

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

DIGITAL REG OF TEXAS, LLC,

16 Plaintiff,

17 v.  
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19 ADOBE SYSTEMS INCORPORATED,  
20 VALVE CORPORATION, ELECTRONIC  
21 ARTS INC., UBISOFT, INC., SYMANTEC  
22 CORPORATION, AVG TECHNOLOGIES  
USA, INC., ZYNGA GAME NETWORKS  
INC., ZYNGA, INC., and INTUIT INC.

23 Defendants.

24 Case No. 4:12-cv-01971-CW (KAW)

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**STIPULATION AND [PROPOSED]  
ORDER OF DISMISSAL AS TO  
DEFENDANT AVG TECHNOLOGIES  
USA, INC**

1 IT IS HEREBY STIPULATED AND AGREED, by and between plaintiff Digital Reg of  
2 Texas, LLC, ("Plaintiff") and defendant AVG Technologies USA, Inc. ("Defendant"), pursuant to  
3 Fed. R. Civ. P. 41(a)(2) and subject to the approval of the Court, that Plaintiff's claims in this  
4 action be, and upon approval are, dismissed WITH PREJUDICE and Defendant's counterclaims  
5 in this action be, and upon approval are, dismissed WITHOUT PREJUDICE, subject to the terms  
6 of that certain agreement entitled "SETTLEMENT AND LICENSE AGREEMENT" dated March  
7 20, 2013, with each party to bear its own cost, expenses, and attorney's fees.

8  
9 Dated: April 1, 2013

BARTKO ZANKEL TARRANT & MILLER

10 By: /s/ W. Paul Schuck  
11 W. Paul Schuck

12 DiNOVO PRICE ELLWANGER & HARDY LLP  
13 Andrew G. DiNovo (admitted *Pro Hac Vice*)  
Adam G. Price (admitted *Pro Hac Vice*)

14 Attorneys for Plaintiff  
15 DIGITAL REG OF TEXAS, LLC

16 Dated: April 1, 2013

GOODWIN PROCTER LLP

17 By: /s/ William A. Meunier  
18 William A. Meunier (admitted *Pro Hac Vice*)

19 Attorneys for Defendant  
20 AVG TECHNOLOGIES USA, INC.

23 **ATTESTATION OF E-FILER**

24 In compliance with Local Rule 5-1(i), the undersigned ECF user whose identification and  
25 password are being used to file this document, hereby attests that all signatories have concurred in  
26 the filing of this document.

27 Dated: April 1, 2013

/s/ W. Paul Schuck  
W. Paul Schuck

**[PROPOSED] ORDER OF DISMISSAL**

CAME ON THIS DAY for consideration the Stipulation of dismissal with prejudice of all claims asserted by plaintiff Digital Reg of Texas, LLC, against defendant AVG Technologies USA, Inc., and dismissal without prejudice of all counterclaims asserted by defendant AVG Technologies USA, Inc. against plaintiff Digital Reg of Texas, LLC, in this case and the Court being of the opinion that said Stipulation should be ENTERED, it is hereby

ORDERED, ADJUDGED AND DECREED that all of plaintiff's claims asserted against defendant in this suit are hereby dismissed with prejudice and all of defendant's counterclaims asserted in this suit are hereby dismissed without prejudice, subject to the terms of an agreement entitled "SETTLEMENT AND LICENSE AGREEMENT" and dated March 20, 2013.

It is further ORDERED that all attorneys' fees and costs are to be borne by the party that incurred them.

DATED: 4/1/2013

Claudia Wilken  
The Honorable Claudia Wilken  
United States District Court Judge